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To: The Public Service Commission of Utah
From: The Office of Consumer Services
Michele Beck, Director
Béla Vastag, Utility Technical Consultant
Date: February 18, 2026
Subject: Docket No. 24-035-10 – OCS Comments
Investigation, Re: Open Market Operations

INTRODUCTION

On December 19, 2025, the Division of Public Utilities (“DPU”) filed comments in this docket in which it requested that the Public Service Commission of Utah (“PSC”) require Rocky Mountain Power (“RMP” or “the Company”) file an annual report, along with providing a presentation to parties, on its market activities, market instruments and products, the market requirements (including from the CAISO Extended Day-Ahead Market or “EDAM”) placed on the PacifiCorp system, its experience interacting with market organizations and any modifications to its policies, procedures and reporting related to transacting in the market.

On February 2, 2026, the PSC issued a Notice of Comment Period asking parties to submit responsive comments to the DPU’s memo and reporting recommendations by February 18, 2026. Accordingly, the Utah Office of Consumer Services (“OCS”) submits these comments responding to the DPU’s recommendation for the Company to submit an annual report on its market activities.

PACIFICORP’S RELIANCE ON MARKET PURCHASES HAS BEEN VERY COSTLY

The OCS supports more reporting on PacifiCorp’s market activities because the Company’s market purchases of power have been very costly for ratepayers. In the Company’s 2024 Energy Balancing Account (“EBA”) application (Docket No. 24-035-01), RMP detailed that most of the increase between base net power costs (“NPC”) and actual NPC was due to a \$815 million increase in purchased power expense (for costs in CY 2023). In the 2025 EBA application (Docket No. 25-035-01), most of the increase in NPC



was also due to \$820 million of increased purchased power (actual purchases of \$1,421 million versus an assumed base of \$601 million for CY 2024). In RMP’s last rate case, Docket No. 24-035-04, increased costs of market purchases was the primary driver in the proposed significant rate increase. Actual market purchases in 2024 were 20,600 GWh versus a base assumed in the 2020 general rate case test year of 13,800 GWh, a 49% increase. The average price of market purchases in 2024 was \$69.00 per MWh versus an assumed base cost of \$43.50 per MWh, a 59% increase.¹

Mostly as a result of the increased cost of market purchases, the EBA charge for RMP Schedule 1 customers (Residential Service) is a 22.14% adder or increase to the cost of the electricity consumed in one month (see RMP Electric Service Schedule No. 94, Sheet No. 94.11, filed October 10, 2025).

PACIFICORP DOES NOT PLAN TO ACQUIRE NEW RESOURCES FOR THE EAST SIDE OF THE SYSTEM

Except for the TerraPower Natrium nuclear plant in 2032, PacifiCorp does not plan any significant new resources to serve the East side of its system until 2036 (see table below from PacifiCorp’s Draft 2025 IRP Update released on January 30, 2026).² The “Block Products” in Table 7.3 are additional market purchases.

Table 7.3 – Utah/Idaho/Wyoming/California Nameplate Capacity Additions (megawatts)

UIWC Shares by Resource Type and Year, Installed MW																				
Resource	Installed Capacity, MW																			
	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	Total
Gas - CCGT	-	-	-	-	-	-	-	-	15	721	-	-	-	-	-	-	-	-	355	1,091
Gas - Peaking	-	-	-	-	-	-	-	-	-	-	-	-	185	-	-	41	656	-	247	1,129
Block Product	-	-	-	-	210	207	343	456	640	640	640	640	640	640	640	640	640	640	640	516
Nuclear	-	-	-	-	-	338	-	-	-	-	-	-	-	-	-	-	-	-	-	338
Renewable Peaking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DSM - Energy Efficiency	-	112	118	130	208	196	165	173	181	184	165	184	167	151	149	192	138	108	96	2,927
DSM - Demand Response	2	5	173	27	15	16	16	22	24	22	0	80	12	0	77	30	21	4	182	732
Renewable - Wind	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Utility Solar	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Small Scale Solar	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Battery (< 8 hour)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Battery (24+ hour)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

The Company has explicitly stated that it “does not need new resources to serve Utah customers”.³ One of the reasons for the Company’s lack of East side resource procurement is that it assumes most of Oregon and Washington’s current shares of existing coal and gas generation will eventually be 100% allocated to serve the East side states – Utah, Wyoming and Idaho.⁴ The Company makes this assumption due to

¹ See Docket No. 25-035-01, DPU Preliminary Review, May 27, 2025, Table 2, page 9.

² [2025 IRP Update Draft \(January 30, 2026\)](#), page 71.

³ Docket No. 25-03-52, RMP Comments, September 19, 2025, page 2.

⁴ PacifiCorp January 28, 2026 2027 IRP Public Input Meeting, recording available at:

<https://youtu.be/Oz4jfoRgPl8>, meeting materials available at:

<https://www.pacificorp.com/energy/integrated-resource-plan/public-input-process.html>

statutory requirements in Oregon and Washington for carbon-free electricity. The target dates for 100% fossil-fuel-free electricity are 2040 for Oregon and 2045 for Washington.⁵ The limitations for coal are more restrictive as Oregon's HB 2021 bans imported electricity from coal-fired resources by 2030 and Washington's CETA eliminated coal power at the end of 2025.⁶

Due to these statutory requirements for non-carbon emitting electricity, the Company plans to situs assign new resources to either the West side or the East side and currently has two RFPs outstanding to acquire new resources specifically for Oregon and Washington.⁷ However, on February 17, 2026 (the day before the filing deadline for these comments), PacifiCorp announced that it was selling its Washington assets (wind, gas and distribution infrastructure) to Portland General Electric Company ("PGE").⁸ It is unclear what will happen to PacifiCorp's fossil-fuel-fired resource fleet as the Oregon deadline of 2040 approaches and if the Company's Washington assets are successfully sold to PGE or by the CETA deadline of 2045. It is unknown if the Company's assumption that the existing fossil-fueled resources will be "transferred" and be able to serve Utah, Wyoming and Idaho's electricity needs for decades into the future is correct.

As described above, the Company has no intent to procure new resources to serve its East side in the next 10 years which most likely means that market purchases will continue to be needed to fill in the gaps of Utah's energy and capacity requirements and cover shortages during extreme or unforeseen circumstances. As the 2024 and 2025 EBA filings show, continued reliance on market purchases is risky and costly. Therefore, parties in Utah would benefit from having additional information on the Company's market activities when we review RMP's general rate case, EBA and IRP filings; and the OCS supports the DPU's request for more reporting on the Company's market transactions and processes. The OCS highlights that such reporting would also be helpful in monitoring PacifiCorp's transition to and operations in the EDAM which is scheduled to occur on May 1, 2026.⁹

RECOMMENDATION

The OCS recommends that the PSC require RMP to implement the annual reporting and presentation items as outlined in the DPU's December 19, 2025 comments in this docket.

⁵ See [Oregon HB 2021](#) and [Washington Clean Energy Transformation Act](#) (CETA).

⁶ The US Department of Energy issued an [Emergency Order](#) on 12/16/2025 requiring the last coal plant in Washington (Centralia) remain operational for 90 days until 03/16/2026. Also, CETA allows Washington to receive electricity from the open market which is "unspecified" and may contain coal-fired electricity.

⁷ See <https://www.pacificorp.com/suppliers/rfps.html>

⁸ See: <https://www.pacificorp.com/about/newsroom/news-releases/pacificorp-to-sell-washington-service-area-to-pge.html>

⁹ [FERC approves PacifiCorp tariff revisions for Extended Day Ahead Market \(EDAM\)](#)

cc:

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